

**ACE TELEPHONE ASSOCIATION  
dba ACE COMMUNICATIONS LONG DISTANCE  
Application for Streamlined Global Resale Authority**

**RESPONSES TO QUESTIONS 14 AND 15**

**Response to Question 14: Ownership**

Ace Telephone Association dba Ace Communications Long Distance (“Ace”) is an operating division of Ace Telephone Association (also “Ace”).

Ace is a telephone cooperative which has over 11,000 member-owners in Minnesota, and over 4,500 member-owners in Iowa. No individual or entity owns a direct or indirect ownership interest of 10 percent or more in Ace.

Ace does not have any interlocking directorates with any foreign carrier.

**Response to Question 15: Authorization and Facilities Sought**

Ace has not previously received authority under Section 214 of the Communications Act. With the grant of this application, Ace will have international global switched resale authority under Section 214 of the Communications Act.

Ace is not applying for authority to acquire facilities or to provide services not covered by Sections 63.18(e)(1) and Section 63.18(e)(2) of the Commission’s Rules. In fact, Ace is seeking only global resale authority under Section 63.18(e)(2) of the Rules. Ace will not construct, acquire or operate its own international facilities, and therefore is not providing a description of facilities or an environmental assessment.

Ace certifies that it will comply with the terms and conditions of Sections 63.21 and 63.23 of the Commission’s Rules.